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Jim Christiansen

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Subject CSS SAP

Jeff

I met with Chris Weis and Aubrey Miller today on the SAP. Chris had a few specific comments which I'm relaying below so you can begin to address them immediately. These coupled with all the other comments you are receiving will be used to prepare a "Draft Final" version for my final review as we discussed. In addition to that, Chris suggested we meet with SRC prior to going final (perhaps Tuesday the 30th in the AM) to ensure there is good coordination between this SAP and the many things they've done and are doing. It's a good idea and needs to happen. This will also allow us to have a final once over on several important points among key people. Here is what I need you to do:

- 1 Continue to collect and address comments as you receive them according to my previous email. Time of the essence. I need you to be aggressive and not wait for folks to contact you.
- 2 Feel free to call individuals here especially Chris and Mary to discuss specific questions.
- 3 After you've gotten what you're going to get, produce a few copies of a draft final version for next week, maybe six copies, unbound, not fancy, just the facts. We'll use this as a basis for discussion at the meeting and for final language review. Get them out a day or so in advance of any meeting if possible.
- 4 Coordinate and set up meetings with (1) Mary as you already have to go over QA stuff in greater detail (2) Me, Mary, Chris, Aubrey, and SRC for meeting above. We thought about Tuesday the 29th but it may have to be a little later in the week. I think it needs to happen the week of the 29th. Set it any time that works for your project schedule and coordinate directly with Chris. His extension is x6671. Everyone's email is above.

Here are key comments from Chris/Aubrey (some overlap with Mary's comments):

- 1 I will need you to do some database work to address one of Chris's comments. It gets to further support for some of our assumptions, namely that visible vermiculite = detectable asbestos. Won't go into it here but we'll discuss via phone.
- 2 Some of the SOPs are too generic and need to be revised to be more specific to our work. Chris specifically pointed out soil sampling (SOP 1.3). I believe most of these were used in the Phase I QAPP even if they were, we need to make sure they are better and more project specific for this work. Chris also feels that he and Mary should sign off on any project specific SOPs, not just CDM. Contact Chris directly on this and we can finally discuss at SRC meeting when it happens.
- 3 There is already a system of field logbooks being used. If we aren't, we need to continue it. I'm not familiar with it so I can't give any specific guidance. Dave Schroeder can give guidance. Questions talk to Chris directly.
- 4 On Page 1 of the SOP for data validation of IR in Appendix A, scratch the sentence "No U.S. EPA approved criteria."
- 5 Chris feels strongly similar to what we've discussed previously and Mary has suggested that we need an "external" QA person. This would likely be someone external to CDM, unencumbered by company alliances, who could be a watchdog to ensure QA is happening on various fronts. I would still sign off on things for EPA, with assistance/input from Mary and/or Chris. This was something to discuss details with Mary and Chris reinforced the need. Again we'll have to discuss staffing & \$. Chris also asked about "data handling" procedures which I'm assuming will be better spelled out in the next draft after you discuss with Mary and

Chris if you need to

- 6 Lastly and this is my comment we may need to modify the language in places regarding ZAI I d assumed at this point we d have the action memo & PHE signed but we don t and may not in the next few weeks At a minimum we should add some language somewhere that the SAP was written assuming the PHE & ZAI removal but that if it doesn t happen sampling will proceed in the same way and cleanup decisions will be deferred It will still be important to ID places with zonolite

Next two weeks are where you guys earn your money lots of input short turnaround and a difficult problem High expectations

Jim